

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

In re: PHARMACEUTICAL INDUSTRY)	
AVERAGE WHOLESALE PRICE)	
LITIGATION)	MDL No. 1456
_____)	Civil Action No. 01-12257-PBS
)	
THIS DOCUMENT RELATES TO:)	Hon. Patti Saris
)	
<i>United States of America ex rel. Ven-a-Care of</i>)	Magistrate Judge Marianne B. Bowler
<i>the Florida Keys, Inc., v. Abbott Laboratories,</i>)	
<i>Inc., CIVIL ACTION NO. 06-11337-PBS</i>)	
)	

**UNOPPOSED MOTION BY THE UNITED STATES FOR
EXTENSION OF TIME TO RESPOND TO ABBOTT'S MOTION
TO COMPEL ADEQUATE RESPONSES TO DISCOVERY REQUESTS**

The United States moves this Court to extend by 14 days (from May 15, to May 29, 2007) the date by which it may respond to Defendant Abbott Laboratories, Inc.'s (Abbott's) Motion to Compel Adequate Responses to Abbott's Discovery Requests. Counsel for Abbott has stated that Abbott does not oppose the United States' request.

Abbott's motion to compel, filed on May 1, addresses a number of issues relating to the broad ranging discovery that has been propounded to the United States. The United States is preparing a detailed response which addresses the assertions and arguments in Abbott's briefs. Additional time is required to complete work on that response. Based on the foregoing, the United States respectfully moves this Court for a fourteen-day extension of time to respond to the above-noted motion to compel by Abbott.

Respectfully Submitted,

For the United States of America,

MICHAEL J. SULLIVAN
UNITED STATES ATTORNEY

PETER D. KEISLER
ASSISTANT ATTORNEY GENERAL

/s/ George B. Henderson, II
George B. Henderson, II
Assistant U.S. Attorney
John Joseph Moakley U.S. Courthouse
Suite 9200, 1 Courthouse Way
Boston, MA 02210
(617) 748-3398
(617) 748-3272

R. ALEXANDER ACOSTA
UNITED STATES ATTORNEY
SOUTHERN DISTRICT OF FLORIDA

/s/ Mark A. Lavine
Mark A. Lavine
Ana Maria Martinez
Ann St.Peter-Griffith
Special Attorneys for the Attorney General
99 N.E. 4th Street, 3rd Floor
Miami, FL 33132
Phone: (305) 961-9003
Fax: (305) 536-4101

/s/ Justin Draycott
Joyce R. Branda
Daniel R. Anderson
Renée Brooker
Justin Draycott
Gejaa T. Gobena
John K. Neal
Rebecca A. Ford
Civil Division
Commercial Litigation Branch
P. O. Box 261
Ben Franklin Station
Washington, D.C. 20044
Phone: (202) 307-0405

Dated: May 15, 2007

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused an electronic copy of the above
“UNOPPOSED MOTION BY THE UNITED STATES FOR EXTENSION OF TIME TO
RESPOND TO ABBOTT’S MOTION TO COMPEL ADEQUATE RESPONSES TO
DISCOVERY REQUESTS” to be served on all counsel of record via electronic service pursuant
to Paragraph 11 of Case Management Order No. 2 by sending a copy to LexisNexis File &
Serve for posting and notification to all parties.

Dated: May 15, 2007

/s/ Justin Draycott
Justin Draycott